

THE HONORABLE JAMAL N. WHITEHEAD

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

PLAINTIFF PACITO; PLAINTIFF ESTHER;
PLAINTIFF JOSEPHINE; PLAINTIFF SARA;
PLAINTIFF ALYAS; PLAINTIFF MARCOS;
PLAINTIFF AHMED; PLAINTIFF RACHEL;
PLAINTIFF ALI; HIAS, INC.; CHURCH
WORLD SERVICE, INC.; and LUTHERAN
COMMUNITY SERVICES NORTHWEST,

Plaintiffs,

v.

DONALD J. TRUMP, in his official capacity as
President of the United States; MARCO RUBIO,
in his official capacity as Secretary of State;
KRISTI NOEM, in her official capacity as
Secretary of Homeland Security; ROBERT F.
KENNEDY, JR., in his official capacity as
Secretary of Health and Human Services,

Defendants.

Case No. 2:25-cv-255-JNW

**DECLARATION OF MELISSA
KEANEY IN SUPPORT OF
PLAINTIFFS' REPLY IN
SUPPORT OF MOTION FOR
PRELIMINARY INJUNCTION ON
SUPPLEMENTAL PLEADING**

I, Melissa Keaney, hereby declare as follows:

1. I am over the age of eighteen and competent to make this declaration. I am an attorney with the International Refugee Assistance Project and counsel for Plaintiffs in the above-captioned matter. I make this declaration based on personal knowledge about which I am competent to testify.

2. I submit this declaration to provide the Court true and correct copies of certain documents submitted in support of Plaintiffs' reply in support of their motion for a preliminary injunction on supplemental pleading:

Exhibit 1 is a true and correct copy of the declaration of Emily Russ (with Attachment A), dated March 11, 2025.

Exhibit 2 is a true and correct copy of the declaration of Plaintiff Ali, dated March 11, 2025.

Exhibit 3 is a true and correct copy of the declaration of Jenifer Smyers, dated March 11, 2025.

* * *

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.

EXECUTED this 11th day of March, 2025, at Sacramento, California.

s/ Melissa Keaney
Melissa Keaney